

UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION

CAROLYN MILLENDER )  
                          )  
Plaintiff,            )  
                          )  
VS.                    ) CASE NO.: 2:07-cv-145-MHT  
                          )  
H. COUNCILL TRENHOLM STATE )  
TECHNICAL COLLEGE; ANTHONY )  
MOLINA, in his official capacity as )  
President of H. Councill Trenholm State )  
College                  )  
                          )  
Defendants.           )

**MOTION FOR EXTENSION OF EXPERT WITNESS DEADLINE**

COMES NOW, the Defendant through undersigned counsel and respectfully asks this Honorable Court to extend the Defendant's expert witness deadline by twenty-one (21) from Friday, September 14, 2007 to Friday, October 5, 2007, and as grounds therefore shows as follows:

1. That the discovery deadline is not until December 7, 2007, and the trial is not set until March 31, 2008.
2. That in light of the foregoing, the Plaintiff will not be prejudiced by extending the expert witness deadline by twenty-one (21) days.
3. Plaintiff's counsel do not agree to an extension of the Defendant's expert witness deadline.

THEREFORE, the Defendant respectfully requests that this Honorable Court extend the expert witness deadline from Friday September 14, 2007, to Friday, October 5, 2007.

Respectfully submitted,

TROY KING  
Attorney General  
By:

/s/ MARY GOLDTHWAITE  
MARY GOLDTHWAITE  
(GOL013)  
Assistant Attorney General

OF COUNSEL:

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**CERTIFICATE OF GOOD FAITH**

Comes now Defendant's counsel, and in accordance with Rule 37  
Federal Rules of Civil Procedure, certifies that she has in good faith  
attempted to resolve this matter without the Court's assistance.

/s/ MARY GOLDTHWAITE  
MARY GOLDTHWAITE

**CERTIFICATE OF SERVICE**

I hereby certify that I have, on this 7<sup>th</sup> day of September, 2007, electronically filed the foregoing with the Clerk of the Court, using the CM/ECF filing system, and that I have further served a copy of the foregoing upon the foregoing, by placing same in the United States Mail, postage prepaid and properly addressed as follows:

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/s/ MARY GOLDTHWAITE  
OF COUNSEL